

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THE HIPSAVER COMPANY, INC.,)	
)	Civil Action No. 05-10917 PBS
Plaintiff,)	
)	
v.)	
)	
J.T. POSEY COMPANY,)	
)	
Defendant.)	
)	
AND RELATED COUNTERCLAIM.)	
)	

**STIPULATION AND REQUEST FOR ORDER RE DEFENDANT'S
RESPONSE TO PLAINTIFF'S FURTHER MOTION TO COMPEL
IMMEDIATE PRODUCTION OF DOCUMENTS AND INFORMATION IN
RESPONSE TO ITS SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS**

Plaintiff The HipSaver Company, Inc. ("HipSaver") and Defendant J.T. Posey Company, Inc. ("Posey") through their respective attorneys, hereby stipulate as follows:

1. Plaintiff electronically filed and served its Further Motion to Compel Immediate Production of Documents and Information in Response to its Second Request for Production of Documents (the "Motion") on April 3, 2006 (Docket No. 113);
2. Defendant's deadline to file and serve its response to the Motion is currently April 17, 2006;
3. On April 13, 2006, counsel for Posey, Douglas H. Morseburg, was involved in an accident in which he suffered serious physical injuries;

4. As a consequence of the foregoing, the parties agree that the time within which Posey is required to file and serve its opposition to the Motion shall be extended by one week, to and including, April 24, 2006, and they hereby request the Court to order that the deadline shall be extended accordingly.

Dated: April 17, 2006

J.T. POSEY COMPANY
By its attorneys,

/s/ Douglas H. Morseburg
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Dated: April 17, 2006

THE HIPSAVER COMPANY, INC.
By its attorneys,

/s/ Edward J. Dailey
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